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April 28, 2021

VIA ECF

The Honorable Roanne L. Mann
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Fischler v. Assembly Brands, Inc. Case No. 1:21-cv-00423-FB-RLM

Dear Judge Mann:

We represent defendant Assembly Brands, Inc. ("Defendant") in the above-referenced matter. Together with counsel for plaintiff, Brian Fischler, we jointly and respectfully move this Court to stay all case deadlines in this action for forty five (45) days, from April 28, 2021 to June 14, 2021.

This requested stay will permit the parties to finalize their efforts to bring about the voluntary dismissal of all claims asserted in this action without further litigation. Once those efforts are complete, the parties will file a stipulation of voluntary dismissal.

Respectfully submitted,

/s/ Timothy J. Straub
Timothy J. Straub

cc: All counsel of record (by ECF)